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VIA ECF

The Honorable Andrew L. Carter, Jr.  
 United States District Judge  
 Southern District of New York  
 500 Pearl Street, Courtroom 17A  
 New York, NY 10007

USDC SDNY  
 DOCUMENT  
 ELECTRONICALLY FILED

April 16, 2024

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 DATE FILED: 4/16/2024

Re: *Pierre v. City of New York, et al.*, No. 1:20-cv-05116-ALC-VF

Dear Judge Carter:

We represent Plaintiffs and write jointly with Defendant TD Bank N.A. to respectfully request a 2.5-month extension of the deadline to file final approval papers.


The Settlement Administrator issued settlement notices and claim forms to the approximately 5,500 class members. After the deadline to submit the forms expired, the parties agreed to provide additional time to claimants who had special circumstances like being on military leave, having medical issues, not timely receiving the initial mailing, or other circumstances. After expiration of the agreed upon extended deadline, Plaintiffs' counsel conferred with the late claimants to obtain information about each of their claimed "special circumstance" and submitted the report to TD Bank in furtherance of their inclusion in the settlement. The parties then undertook several rounds of meeting and conferring and obtaining further information from the late claimants. The parties just completed these negotiations and came to agreements as to the inclusion of these late claimants in the settlement in accordance with the terms of the settlement agreement.

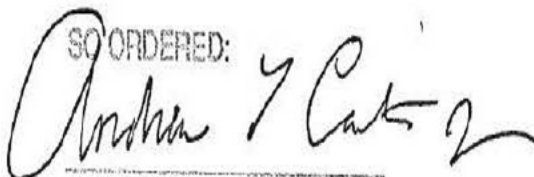
Now that the universe of claimants is finalized, the Settlement Administrator is able to proceed with preparing their detailed settlement report which will be submitted to the Court and also used to prepare the final approval papers. The parties need additional time to allow the Settlement Administrator to complete its work.

As such, the parties respectfully request that the deadline to file the final approval papers be extended from April 19, 2024 to **July 12, 2024** and that the Fairness Hearing be adjourned from May 6, 2024 at 11am to **July 29, 2024** at 11am or for any date and time thereafter that is convenient for the Court.

This is the parties' third request for an extension of these deadlines. We thank the Court for its time and attention to this matter.

Respectfully submitted,

  
 Innessa M. Huot

SO ORDERED:  
  
 HON. ANDREW L. CARTER, JR.  
 UNITED STATES DISTRICT JUDGE

Dated: April 16, 2024

The Fairness Hearing is hereby adjourned to July 30 at 4 PM. All other deadlines are adjourned as requested..